

COMMONWEALTH OF MASSACHUSETTS
UNITED STATES DISTRICT COURT

CIVIL ACTION NO.: 04-11800DPW

ADAM HELFAND, CARON HELFAND,)
AND MITCHELL HELFAND,)
Plaintiffs)
v.)
THE JOHN DEWEY ACADEMY, INC.,)
THOMAS BRATTER, CAROLE BRATTER,)
KEN STEINER, AND GWENDOLYN)
HAMPTON,)
Defendants)

JOINT MOTION TO EXTEND THE TIME FOR FILING
STIPULATION OF DISMISSAL

NOW COME the parties in the above-captioned matter and hereby request this Honorable Court extend the time to file a Stipulation of Dismissal an additional thirty days to **November 10, 2006**. As grounds therefore, the parties state the following:

1. The parties were able to amicably resolve this case on or about September 7, 2006.
2. The Court issued a Settlement Order of Dismissal on September 11, 2006 indicating that a Stipulation of Dismissal or an Agreement for Judgment be filed with the Court by October 11, 2006.
3. Since the Settlement Order of Dismissal issued, the parties have been finalizing the terms of the Settlement Agreement and Release of All Claims and anticipate executing them within the next thirty days, if not before.

4. The parties anticipate filing a Stipulation of Dismissal after the settlement agreement has been executed by all parties.

WHEREFORE, the parties request an additional thirty days to **November 10, 2006** in which to file a Stipulation of Dismissal to allow the parties ample time to secure a fully executed Settlement Agreement and Release of All Claims.

Respectfully submitted,
The Plaintiffs,
Adam Helfand, Caron Helfand, and
Mitchell Helfand,
By their attorneys,

Respectfully submitted,
The Defendants,
The John Dewey Academy, Inc.,
Thomas Bratter, Carole Bratter,
and Ken Steiner,
By their attorneys,

/s/ Djuna E. Perkins
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Respectfully submitted,
The Defendant,
Gwendolyn Hampton,
By her attorney,

/s/ William A. Rota
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DATED: October 10, 2006